

EXHIBIT 289

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

EXPERT REPORT OF BRIDGETTE CARR

June 16, 2023

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the U.S. Virgin Islands this amount; rather, it is my opinion this is a reasonable proxy for assessing how much money per victim would be needed to set up such a fund.

220. In my opinion, it is impossible to know the full scope of Epstein's sex trafficking venture or to identify every victim of his trafficking. However, it is possible to come up with a reasonable proxy for the number of victims trafficked in, from, or to the U.S. Virgin Islands based on the materials produced in this case.
221. It is difficult to piece together the exact arrival and departure of all victims to Epstein's residence in the U.S. Virgin Islands, because, according to my conversation with [REDACTED], some women arrived and left solely on commercial flights, and some traveled one way on Epstein's private plane but left commercially, and at least one flew in and out of St. Barts. Additionally, even if all the victims had only traveled on Epstein's private plane, it does not appear a flight log was always kept.³⁸²
222. While the passenger manifests are not complete, they are still revealing. I reviewed the passenger manifests for Epstein's plane with the tail number N908JE for 2005 and 2007.³⁸³ Based on my review, I found approximately 22 trips either to or from the U.S. Virgin Islands for 2005 and 34 trips for 2007. If I thought a trip was a same-day trip from and to another island, I did not include the return trip in my tally. From this same review of the passenger manifests, I counted approximately 21 females who were flown to or from the U.S. Virgin Islands in 2005, and 13 in 2007.³⁸⁴ I recognized some of the names as known Epstein victims from other materials I reviewed in this case. A few of the names from 2005 appeared in 2007 as well; however, I counted 10 females in 2007 who I could not identify on trips in 2005. Bringing in new females is consistent with the sex trafficking pattern Epstein established.
223. Based on my review of flight logs, payments to women, and my interview with [REDACTED],³⁸⁵ it is reasonable to assume 10 new female victims were trafficked in, from, or to the U.S. Virgin Islands per year as part of Epstein's sex trafficking venture.
224. Based on that information, I estimate that Epstein trafficked 10 unique individuals to the U.S. Virgin Islands each year between 2002 and 2013, except for 2008 and 2009 when Epstein was incarcerated or under house arrest, or a total of 100 women.

³⁸² Unsealed Maxwell Documents at 257 (David Rodgers Dep. (June 3, 2016) at 103:10-22) (explaining that at least one of Epstein's pilots did not keep a flight log).

³⁸³ I picked these years because the flight logs seemed more complete than other years.

³⁸⁴ For the total number of potential female victims, I did not include Ghislaine Maxwell or females traveling in family units with individuals I assumed were male relatives (e.g., [REDACTED]), I did not include an individual listed as "nanny" or someone referred to as "JP," nor did I include Larry Visoski's (pilot) family members. I did include individuals without a name but listed as "female".

³⁸⁵ [REDACTED] told me she traveled to the USVI many times with Epstein. She said it was so many times she was could not even estimate because it was such a regular occurrence.

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V. CONCLUSION

236. Given the above facts and principles and my expertise in the area, I herein state the following summary opinions:
- a. Human trafficking presents in different ways but has the same core elements;
 - b. One common theme in human trafficking is the targeting of vulnerable people to victimize;
 - c. Human trafficking typologies and red flags can be helpful when assessing potential human trafficking;
 - d. Jeffrey Epstein directed a sex trafficking venture in which he recruited economically vulnerable girls and young women and with force, fraud, or coercion, or because they were minors, compelled them to perform commercial sex acts;
 - e. JPMorgan's own due diligence indicates Epstein was involved in sex trafficking;
 - f. Jes Staley's communications with Epstein showed red flags for human trafficking;
 - g. Jeffrey Epstein's JPMorgan accounts showed signs of human trafficking;
 - h. Jeffrey Epstein's sex trafficking venture relied on many individuals and entities—including JPMorgan—to operate;
 - i. JPMorgan had a unique opportunity to intervene and help Epstein's victims who banked with JPMorgan—including [REDACTED];
 - j. Compensation for the harms victims suffered should reflect the severity, scope, and duration of the abuse they suffered, as assessed herein; and
 - k. JPMorgan should implement meaningful injunctive relief to prevent future participation in sex trafficking ventures.
237. I reserve the ability to supplement or amend my opinions, to state further opinions, or to rebut any subsequent allegations, depositions, expert reports, etc. that might arise in these matters.

Respectfully submitted, this 16th day of June 2023.


Bridgette Carr